

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

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STATE OF ALABAMA, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
COMMERCE, *et al.*,

Defendants.

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Case No. 2:18-cv-00772-RDP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

Defendants United States Department of Commerce, Wilbur L. Ross, Bureau of the Census, and Ron S. Jarmin (“Defendants”), through their undersigned counsel, hereby move for a 30-day extension of time to file an Answer in this case. As set forth below, counsel for Defendants has conferred with other parties in this litigation, who do not oppose this extension request. In support of their motion, Defendants state as follows:

1. This Court denied Defendants’ motion to dismiss on June 5, 2019. Accordingly, Defendants’ Answer to the Complaint is currently due on June 19, 2019. *See* Fed. R. Civ. P. 12(a)(4)(A).

2. Defendants request a 30-day extension of time, to and including July 19, 2019, to file an Answer.

3. Plaintiffs’ Complaint is substantial in length, totaling 34 pages and 158 paragraphs. Moreover, preparing the Answer will require internal governmental coordination. Accordingly, an extension of time is necessary in order to allow Defendants adequate time to prepare their Answer.

4. Undersigned counsel for Defendants has conferred with counsel for Plaintiff State of Alabama regarding this motion. Plaintiff State of Alabama has represented that Plaintiffs do not oppose this request. Moreover, neither the local government intervenor-defendants nor the *Martinez* intervenor-defendants oppose this request, though the *Martinez* intervenor-defendants have requested that their time to file an Answer also be extended by 30 days. Accordingly, and in order to align the answer deadline for all parties filing answers in this litigation, Defendants request that the answer deadline be extended for all parties until July 19, 2019.

5. Granting the motion will not prejudice any parties or affect any other deadlines in this case.

6. A proposed order is attached hereto.

Dated: June 13, 2019

Respectfully submitted,

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Assistant Attorney General

JOHN R. GRIFFITHS  
Director, Federal Programs Branch

CARLOTTA P. WELLS  
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/s/ Brad P. Rosenberg  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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I also hereby certify that I have caused to be mailed by FedEx Overnight Delivery the document to the following non-CM/ECF participant:

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